

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

WHEEL PROS, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11939 (JTD)

(Jointly Administered)

**Re: Docket Nos. 15 and 90**

**Objection Deadline: October 8, 2024 at 4:00 p.m. (ET)**

**Hearing Date: October 15, 2024 at 10:00 a.m. (ET)**

**NOTICE OF ENTRY OF INTERIM ORDER AND FINAL HEARING  
REGARDING MOTION OF DEBTORS FOR ENTRY OF INTERIM  
AND FINAL ORDERS (I) APPROVING NOTIFICATION AND  
HEARING PROCEDURES FOR CERTAIN TRANSFERS OF AND  
DECLARATIONS OF WORTHLESSNESS WITH RESPECT TO COMMON  
STOCK AND PREFERRED STOCK AND (II) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE** that on September 9, 2024, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Motion of Debtors for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and Preferred Stock and (II) Granting Related Relief* (the “Motion”) [Docket No. 15] with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”). A copy of the Motion was previously served upon you.

**PLEASE TAKE FURTHER NOTICE** that the Debtors presented certain first-day motions at a hearing before the Honorable John T. Dorsey at the Bankruptcy Court on September

The last four digits of Debtor Wheel Pros, LLC's last federal tax identification number are 5738. A complete list of each of the Debtors in these chapter 11 cases and such Debtor's federal tax identification number may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://cases.stretto.com/WheelPros>. The location of the Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is 5347 S Valentia Way, Suite 200, Greenwood Village, Colorado 80111.

10, 2024. The Bankruptcy Court granted the relief requested by the Motion on an interim basis and entered the *Interim Order Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock or Preferred Stock* (the “Interim Order”) [Docket No. 90]. A copy of the Interim Order was previously served upon you.

**PLEASE TAKE FURTHER NOTICE** that any response or objection to the entry of a final order with respect to the relief sought in the Motion must be filed with the Bankruptcy Court on or before **October 8, 2024 at 4:00 p.m. prevailing Eastern Time.**

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response or objection upon: (a) the Debtors, 5347 S Valentia Way, Suite 200, Greenwood Village, Colorado 80111, Attn.: Vance Johnston (vance.johnston@hoonigan.com) and Kyle Pederson (kyle.pederson@hoonigan.com); (b) proposed co-counsel to the Debtors (i) Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, Attn.: Steven N. Serajeddini, P.C. (steven.serajeddini@kirkland.com), Erica Clark (erica.clark@kirkland.com), Olivia Acuña (olivia.acuna@kirkland.com); (ii) Kirkland & Ellis LLP, 333 West Wolf Point Plaza, Chicago, Illinois 60654, Attn.: Anup Sathy, P.C. (anup.sathy@kirkland.com) and Yusuf Salloum (yusuf.salloum@kirkland.com); and (iii) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, P.O. Box 8705, Wilmington, Delaware 19899-8705 (Courier 19801), Attn.: Laura Davis Jones (ljones@pszjlaw.com), Timothy P. Cairns (tcairns@pszjlaw.com), and Edward Corma (ecorma@pszjlaw.com); (c) the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn.: Jane M. Leamy (jane.m.leafy@usdoj.gov); (d) counsel to certain of the DIP Term Lenders and the Ad Hoc Group, Akin Gump Strauss Hauer & Feld LLP, Bank of America Tower, 1 Bryant Park, New

York, New York 10036, Attn.: Philip C. Dublin (pdublin@akingump.com), Zachary D. Lanier (zlanier@akingump.com), and Omid Rahn timer (orahn timer@akingump.com); (e) local counsel to the DIP Term Lenders, Ad Hoc Group, and SVP, Potter Anderson & Corroon LLP, 1313 N. Market Street, 6th Floor, Wilmington, Delaware 19801, Attn.: M. Blake Cleary (bcleary@potteranderson.com); (f) counsel to the DIP Term Loan Agent, Ropes & Gray, LLP, 1211 Avenue of the Americas, New York, New York 10036 Attn: Mark R. Somerstein (Mark.Somerstein@ropesgray.com) and Patricia Chen (patricia.chen@ropesgray.com); (g) co-counsel to the DIP ABL Agent and the Prepetition ABL Agent, (i) Morgan Lewis & Bockius LLP, 101 Park Avenue, New York, New York 10178-0060, Attn.: Stephan E. Hornung (stephan.hornung@morganlewis.com) and David K. Shim (david.shim@morganlewis.com); and (ii) Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market Street, 16th Floor, Wilmington, Delaware 19899-1347, Attn.: Derek C. Abbott (dabbott@morrisnichols.com), and Matthew B. Harvey (mharvey@morrisnichols.com); (h) counsel to certain of the DIP Term Lenders and SVP, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017, Attn.: Damian S. Schiabler (damian.schiabler@davispolk.com), Adam L. Shpeen (adam.shpeen@davispolk.com), and David Kratzer (david.kratzer@davispolk.com); (i) counsel to the Sponsor, Katten Muchin Rosenman LLP, 50 Rockefeller Plaza, New York, New York 10020, Attn: Steven J. Reisman (sreisman@katten.com) and Cindi M. Giglio (cgiglio@katten.com); and (j) any statutory committee appointed in these chapter 11 cases.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE FINAL RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

**PLEASE TAKE FURTHER NOTICE** THAT A HEARING TO CONSIDER THE FINAL RELIEF SOUGHT IN THE MOTION WILL BE HELD ON **OCTOBER 15, 2024 AT 10:00 A.M. PREVAILING EASTERN TIME** BEFORE THE HONORABLE JOHN T. DORSEY, CHIEF UNITED STATES BANKRUPTCY COURT JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 5TH FLOOR, COURTROOM NO. 5, WILMINGTON, DELAWARE 19801.

*[Remainder of page intentionally left blank]*

Dated: September 17, 2024  
Wilmington, Delaware

*/s/ Laura Davis Jones*

---

**PACHULSKI STANG ZIEHL & JONES LLP**

Laura Davis Jones (DE Bar No. 2436)  
Timothy P. Cairns (DE Bar No. 4228)  
Edward Corma (DE Bar No. 6718)  
919 North Market Street, 17th Floor  
Wilmington, Delaware 19801  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400  
Email: ljones@pszjlaw.com  
tcairns@pszjlaw.com  
ecorma@pszjlaw.com

*Proposed Co-Counsel for the Debtors  
and Debtors in Possession*

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**

Steven N. Serajeddini, P.C. (admitted *pro hac vice*)  
Erica Clark (admitted *pro hac vice*)  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900  
Email: steven.serajeddini@kirkland.com  
erica.clark@kirkland.com

-and-

Anup Sathy, P.C. (admitted *pro hac vice*)  
Yusuf Salloum (admitted *pro hac vice*)  
333 West Wolf Point Plaza  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200  
Email: anup.sathy@kirkland.com  
yusuf.salloum@kirkland.com

*Proposed Co-Counsel for the Debtors  
and Debtors in Possession*